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14 Attorneys for Plaintiff, BYRD CATTLE COMPANY LLC

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**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION**

BYRD CATTLE COMPANY, L.L.C., a  
California Limited Liability Company,

Plaintiff,

v.

ALL WEST/SELECT SIRES, a Washington  
Corporation; and DOES 1 through 50,  
inclusive,

Defendants.

Case No. 2:20-cv-00381-JAM-DMC

**REVISED STIPULATION TO CONTINUE  
DATES; ORDER**

By and through their counsel undersigned, the Parties hereby state as follows:

1. The parties have diligently pursued discovery. Written discovery has been  
exchanged and answered. Parties and relevant fact witnesses have been deposed.

2. Discovery conducted to date has made clear that more extensive discovery,  
including the depositions of various persons most knowledgeable must be taken.

3. Due to the logistical complications imposed by Covid-19, the parties do not believe  
they can adhere to the schedule previously proposed to this court, and issued in its Order of April  
22, 2020.

4. Additionally, the after conducting the discovery above, the parties believe they are well situated to mediate this matter, and wish to attempt informal resolution, prior to incurring additional litigation costs.

WHEREFORE, the parties hereby stipulate and respectfully request that this Court Order that the prior dates established in this matter:

Fact discovery cut-off January 15, 2021

Expert disclosures November 13, 2020

Pre-trial Conference April 2, 2021

Trial May 10, 2021

Be continued for approximately six months, to dates of this Court's choosing, as follows:

Discovery Cutoff Date: July 16, 2021

Disclosure of Expert(s) Deadline: May 14, 2021

Supplemental Disclosure Deadline: May 28, 2021

Dispositive Motion Filing Deadline: August 27, 2021

Dispositive Motion Hearing: October 19, 2021 at 1:30 p.m.

Joint Mid-Litigation Statement Deadline: Fourteen (14) days prior to the close of discovery;

Final Pretrial Conference: December 10, 2021 at 10:00 a.m.

Jury/Bench Trial: January 24, 2022 at 9:00 a.m.

RESPECTFULLY SUBMITTED: MCCARTHY & RUBRIGHT, LLP  
December 21, 2020

By: /s/ Thomas Patrick Jr.  
STEVEN B. MCCARTHY  
THOMAS PATRICK, JR.  
Attorneys for Plaintiff, BYRD CATTLE COMPANY,  
L.L.C.

1 RESPECTFULLY SUBMITTED:  
2 December 21, 2020

WOOD, SMITH, HENNING & BERMAN LLP

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4 By: /s/ Robert M. Ferrier

5 ROBERT M. FERRIER

6 Attorneys for Defendant, ALL WEST SELECT SIRES  
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8 **ORDER**

9 For the reasons set forth above, the Court hereby finds good cause for, and grants  
10 permission to continue the dates listed below:

11 Discovery Cutoff Date: July 16, 2021

12 Disclosure of Expert(s) Deadline: May 14, 2021

13 Supplemental Disclosure Deadline: May 28, 2021

14 Dispositive Motion Filing Deadline: August 27, 2021

15 Dispositive Motion Hearing: October 19, 2021 at 1:30 p.m.

16 Joint Mid-Litigation Statement Deadline: Fourteen (14) days prior  
17 to the close of discovery;

18 Final Pretrial Conference: December 10, 2021 at 10:00 a.m.

19 Jury/Bench Trial: January 24, 2022 at 9:00 a.m.  
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22 DATED: December 21, 2020

/s/ John A. Mendez

23 THE HONORABLE JOHN A. MENDEZ

24 UNITED STATES DISTRICT COURT JUDGE  
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